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112701  
SHAUGHNESSEY NO.

REVIEW NO.

EEB REVIEW

DATE: IN 11-26-86 OUT 2-20-87

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DATE OF SUBMISSION 11-15-86

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RD ACTION CODE/TYPE OF REVIEW 350

TYPE PRODUCT(S) : I, D, H, F, N, R, S Rodenticide

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Brodifacoum

COMPANY NAME ICI America's, Inc. (Bowling Green State Univ.)

SUBMISSION PURPOSE Response to previous EEB review

(Comments by Mr. Jackson, Mr. Hegdal and Dr.  
Colvin)

SHAUGHNESSEY NO. CHEMICAL, & FORMULATION § A.I.

Brodifacoum

112701  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

FEB 17 1987

SUBJECT: Letter and Comment Submitted by Mr. William B. Jackson

FROM: Daniel Rieder  
Wildlife Biologist  
Ecological Effects Branch

THRU: Norm Cook  
Supervisory Biologist  
Ecological Effects Branch

THRU: Michael Slimak  
Chief  
Ecological Effects Branch

TO: William H. Miller  
Registration Division (PM-16)

On November 24, 1986, EPA received a letter from Mr. William B. Jackson, a professor at Bowling Green State University. His letter and the attached comments by Bruce Colvin and Paul Hegdal were in reference to a field study protocol submitted to EPA on June 24, 1985, by ICI America's, Inc. and EPA's evaluation (February 6, 1986) of that protocol. Based on EPA's needs and criteria the protocol was rejected. The letter and attached comments generally criticize EPA's evaluation and the proposed protocol. However, two other items of importance were mentioned:

1. The second paragraph indicates that the subject field study has been designed and "executed"; and

2. EPA personnel are invited to a New Jersey field study site "where basic ecological studies are ongoing and where evaluation of secondary hazard from rodenticide usage was successfully evaluated."

In reference to 1, if the study has been completed and if it shows unreasonable adverse effects, the study must be made available to EPA for review based on Section 6 (a) (2) of FIFRA, since Brodifacoum is a registered product.

2

CONCURRENCES

SYMBOL	TS 769C	TS-769C	TS-769C					
SURNAME	Rieder	Cook	Slimak					
DATE	2/17/87	2/18/87	2/18/87					

The staff at EPA is always willing to listen to constructive criticism of their review and hazard evaluation process and will evaluate any substantive suggestions and comments. Thus, we invite Mr. Jackson, Dr. Colvin and Mr. Hegdal to visit EEB to discuss our general review and evaluation process or field study design requirements. Further, EEB appreciates the invitation to visit the New Jersey study site and will do so if travel money and time permit .

In reference to the subject field study proposal, it was evaluated in a scientific and logical manner and was peer reviewed within the EEB for accuracy, consistency and scientific soundness. The comments included in the November 15, 1986, letter do not change our conclusion. The study, considering its design and the measurements that would be made, cannot show that Brodifacoum could be used on orchards without that use causing serious adverse effects to nontarget mammalian and avian species. Any further discussion on the proposed study, its purpose, and EPA's evaluation of the protocol should be with, or at least in the presence of, ICI America's, Inc.

Further, EEB recommends that a copy of the November 15, 1986, letter from Mr. Jackson and the attached comments by Dr. Colvin and Mr. Hegdal be forwarded, along with the substance of this review, to ICI, America's Inc.